

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

RECEIVED
AUG 30 1996
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the matter of)

Implementation of the Non-Accounting)
Safeguards of Sections 271 and 272 of)
the Communications Act of 1934, as)
amended:)

CC Docket No. 96-149

and)

Regulatory Treatment of LEC Provision)
of Interexchange Services Originating)
in the LEC's Local Exchange Area)

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REPLY COMMENTS OF THE ASSOCIATION OF DIRECTORY PUBLISHERS

The Association of Directory Publishers ("ADP")¹, by its attorneys, hereby submits its Reply Comments in the above-captioned proceeding.

ADP's Reply Comments are filed for the purpose of alerting the Commission that the Yellow Pages Publishers Association ("YPPA"), which filed comments in this proceeding, represents the

¹ ADP is a ninety-eight year-old international trade association representing the interests of "independent" telephone directory publishers, that is, publishers of white and yellow pages telephone directories that compete with the Regional Bell Operating Companies and other local exchange carriers ("LECs") in the sale of telephone directory advertising (primarily yellow pages classified advertising). ADP's more than 200 members -- most of which are "small businesses" -- produce telephone directories serving communities throughout the United States.

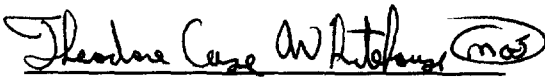
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Association of Directory Publishers
30 August 1996

position of telephone companies and not that of directory publishers. As noted in the attached letter, 71% of YPPA's domestic members have disavowed YPPA's positions in other FCC proceedings for this precise reason. Thus, ADP urges the Commission to treat YPPA's comments as though they were filed by telephone companies and not by directory publishers.

Respectfully submitted,

THE ASSOCIATION OF
DIRECTORY PUBLISHERS

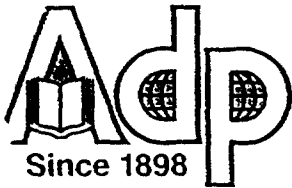
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30 August 1996

ATTACHMENT



Association of Directory Publishers

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August 12, 1996

Ex Parte Communication

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Dear Mr. Caton:

This letter is signed by 115 members of the Yellow Pages Publishers Association (YPPA), which represents 71 percent of YPPA's membership in the United States. We wish to express our strong disagreement with YPPA's position in the Federal Communication Commission's rulemaking concerning Section 222(e) of the 1996 Telecommunications Act. This section deals with the provision of subscriber list information.

/ insinuation, YPPA incorrectly presents itself as the voice of all directory publishers, even to the point of falsely stating that it is the largest trade association of Yellow Pages publishers in North America, representing nearly 200 directory publishers. In fact, the Association of Directory Publishers (ADP), with 211 publisher members, is the largest trade association in the yellow pages business based on number of publishers. We believe ADP's comments represents the interest of directory publishers.

YPPA's bylaws apportion voting rights based on a member's revenues. Consequently, directory publishers affiliated with local exchange carriers - a small minority of YPPA members - dominate and control YPPA's board, and *it's advocacy policies*. What YPPA does not mention is that most of it's members are small, independent directory publishers (publishers not affiliated with local exchange carriers) who have been forced to join YPPA because YPPA controls the processes for receiving national advertising orders.

YPPA's pleadings in the FCC's subscriber list information proceeding do not represent the views of independent publishers but in fact, represent the position of the telephone companies. The fact that YPPA would file comments seeking to force directory publishers to pay a price for subscriber list information that is far in excess of the local exchange carriers' cost is evidence that they favor the local exchange carriers at the expense of all directory publishers. In short, YPPA's comments are contrary to the interest of a majority of its members.

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We are very disappointed with, and strongly opposed to YPPA's position. Subscriber list information is an essential facility which for too long has been denied to independent directory publishers. Again, for the record, the undersigned, a majority of YPPA members, oppose YPPA's positions. If YPPA does not withdraw its comments, the Commission should recognize that YPPA is not an organization representing directory publishers but rather an organization representing local exchange carriers.

Sincerely,

Adco Publishing Co., Inc.	Dale Sanders	St. Cloud, MN	320-253-3215
AGI Publishing, Inc. dba Valley Yellow Pages	Sieg Fischer	Fresno, CA	209-251-8888
AJL Communications, Inc. dba The Northland Telephone Directory Alliance Media, Inc.	Wendy Boley	Kansas City, MO	816-426-8320
Alpha One Publishing, Inc.	Michael Reagan	Nashville, TN	615-885-6728
Alpha Media Creations, Inc.	John Tillman	Highland, CA	909-862-9572
Anaya Associated Publishers, Inc.	Harry Tomlinson	Myrtle Beach, SC	803-236-3208
Anchor Publications, Inc.	Frank Anaya	El Paso, TX	915-545-1688
Area Phonebook Co.	Scott Weikel	Irvine, CA	714-753-5005
Armadillo Advertsing, Inc.	Scott Poindexter	Inverness, MO	601-265-5040
Arnold Avertising, Inc.	Nancy Nygaard	Tomball, TX	713-351-4555
Associated Directories	Jerry Arnold	Sun Valley, CA	818-504-1000
Associated Publishing Co., Inc.	Viva C. White	Alexandria, LA	318-445-3483
ATD-Austin	Bob Allen III	Abilene, TX	915-676-4032
Bi-Rite Directories Inc.	Danny Bills	Austin, TX	512-288-6215
Blue Books, Inc.	Karen Patton	Springfield, MO	417-882-8400
Blue Valley Publications, Inc.	Karen Bruck	Irvington, NY	914-591-8020
Brandon Chamber of Commerce	Bill Emerson	Shawnee, KS	913-631-3500
BRI, Inc.	Tammy Bracewell	Brandon, FL	813-689-1221
K.W. Brock Directories, Inc.	Bill Hammack	Metairie, LA	504-832-9835
Burrows Publishing Co. dba Area Wide Directory Co.	Ronnie Beach	Pittsburg, KS	316-231-4000
Carolina Publishing Co.	Max Burrows	Carrollton, TX	214-242-0225
Centennial Media Corp.	J. Keith Gibson	Salisbury, NC	704-639-0161
Champion Directories, Inc.	Earl Mix	Englewood, CO	303-220-9500
Chinese Media Group	Paitzel D. Meadows	Norwalk, OH	419-668-1280
Coastal Directories, LLC	Matt Davis	San Mateo, CA	415-286-7790
Coastal Publishing of the Carolinas, Inc.	Larry Bernethy	Savannah, GA	912-239-9740
College Directory Publishing, Inc.	Chris Cunningham	Beaufort, SC	803-522-8887
Command Affiliates, Inc.	Michael Paul	Conshohocken, PA	610-940-1515
	Alfred Ferrara	Chesapeake, VA	804-424-4200

Communication Publishing Co.	Lee Thelen	Beaufort, SC	803-986-0872
Community Directory of NC	Rex Story	Wilmington, NC	910-799-2644
Community Directory			
Publishing Service, Inc.	Frank E. Noverr	Traverse City, MI	616-946-7650
Community Telephone Dir. of FL	Walter Peterson, Jr.	New Port Richey, FL	813-847-6263
Community Yellow Pages	Frank Osolnick	Metuchen, NJ	908-755-9595
The Complete Phone Book	Patricia Griffith	Ormond Beach, FL	904-672-1000
Consolidated Directories, Inc. - LA	Allen Carlisle	Lafayette, LA	318-232-4831
County Business Directories, Inc.	Bonnie S. Jerpbak	Chagrin Falls, OH	216-247-4353
County-Wide Dir. Thomson Dir. Div.	Judy Brandabur	West Carrollton, OH	513-859-4613
DataNational	Dan Perti	Chantilly, VA	703-818-0120
DirectMedia Corp.	Gerry Screven	Brunswick, GA	912-262-6900
Directory Plus	Christy Pollard	Durango, CO	970-259-6500
Dixie Directory Co.	Bob Houser	Vicksburg, MS	601-638-6687
EATEL Publishing	Richard Tidovsky	Gonzales, LA	504-647-8555
Far West Yellow Pages	Jeanette Brown	Costa Mesa, CA	714-725-0742
FDC Publishing of the Midwest, Inc.	David Artz	Columbus, NE	402-564-7045
Feist Publications Inc.	Tom Feist	Spearville, KS	316-385-2612
Florida Media Services Inc.-			
Greater Brandon Community Dirs.	Betty Jo Thompkins	Brandon, FL	813-689-1588
Fronteer Directory Co., Inc.	Marlow Lindblom	Bismarck, ND	701-258-4970
Fronteer Directory Co. of MN, Inc.	Bert Holtan	Brainerd, MN	218-828-4711
Frontier Directory Co. of NE, Inc.	Bob Jones	Columbus, NE	402-563-1458
Golden Triangle Telephone Dir., Inc.	Larry Spring	Beaumont, TX	409-899-1299
Gordon Publications	Ralph Gordon	Dallas, TX	214-248-8196
Great Lakes Telephone Dirs. Corp.	Janet Vincenzo	Avon Lake, OH	216-933-3326
Great Western Directories, Inc.	Richard O'Neal	Amarillo, TX	806-353-5155
Gulfstream Publishing, Inc.	Rex Peters	Kill Devil Hills, NC	919-480-2787
Hagadone Directories, Inc.	James Hail	Coeur D'Alene, ID	208-667-8744
Hanson Directory Service, Inc.	William Hanson	Newton, IA	515-792-2855
Home Owners Guide of Florida	Jules Kramer	Sunrise, FL	305-572-1771
Home Town Directories, Inc.	Richard Watson	Tulsa, OK	918-437-0722
I T D Publishers, Inc.	Martin Cikatello	Williamsville, NY	716-634-7880
Impact Directories, Inc.	Keith Baker	Manchester, MO	314-227-8060
Independent Directory Service	George Frye	Rocky Mount, VA	540-483-1221
Independent Tel. Directory Co., Inc.	Sam Pogue	Rockwall, TX	903-455-0808
ITT World Directories, Inc.	Peter Wallace	Secaucus, NJ	201-601-4055
Kiwi Publishing Co., Inc.	David Stratford	St. George, UT	801-628-6286
Lambert Publishing	Steve Lambert	Macon, GA	912-788-5416
Larson Directories, Inc.	Ronald Larson	Cape Coral, FL	941-549-1119
Local Phone Guide Yellow Pages	Stephen Stabile	Lynnfield, MA	617-599-7770
MacGregor Publishing Co.	Mac MacGregor	Mt. Vernon, WA	800-743-0473
Main Street Directories, Inc.	Sandy Sanders	Athens, GA	706-546-6346
Marshfield Yellow Pages	Carl Mueller	Marshfield, WI	715-389-1704
Fast Adv. & Publishing Inc.	Doug Lackey	Spring Hill, TN	615-486-9809
Metropolitan Publishing Co., Inc.	Vickie Brown	Tomball, TX	713-351-6933
MICA, Inc. dba The Guide	Cecil North	Purdys, NY	914-277-8230

William F. Caton, Acting Secretary

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Michigan Directory Co.	Michael Needles	Pigeon, MI	800-338-5970
Midwest Directories, Inc.	Darrell Kramer	Beloit, WI	608-362-2672
The New York Times			
Regional Newspaper Group	Mitch Glaser	Gainesville, FL	352-331-3200
NTD Publishing, Inc.	John E. Richards	Seattle, WA	206-937-5550
Ogden Directories, Inc.	Michael Christman	Parkersburg, NV	304-458-1891
Orange Line Directory, Inc.	Randy McMillen	Westlake, OH	216-899-4900
Pacific Coast Publishing	John Woodall	Tacoma, WA	206-272-8000
Patuxent Publishing Co.	Alice Iskra	Columbia, MD	301-725-8592
Phone Directories Co. Inc.	Marc Bingham	Provo, UT	801-225-0801
Pinnacle Publishing	Paul W. Ledbury	Bemidji, MN	218-586-3104
Prairie Publishing Co., Inc.	Gary Brewer	Wichita, KS	316-688-6095
Reagan Publishing Co.	Michael Reagan	San Antonio, TX	606-255-0400
Shaw Publications, Inc.	Bonnie Shaw	Carrollton, OH	330-627-3938
Southeast Directory Co., Inc.	Don Stewart	Knoxville, TN	423-671-2600
Southern Directory Co., Inc.-SE	Augie Vasha	Decatur, AL	205-772-7558
Southern Directory Co.-TX	Jack Burchfield	Tempe, AZ	713-240-2020
Southern Directory Publishing/ A Local Directory Co.	Wilson Sims	Forsyth, GA	912-994-4636
Southwestern Consolidated Directory Co., Inc.	David Mallory	Livingston, TX	409-327-2444
Southwestern Directory Co., Inc.	Richard A. Wegmann	Dallas, TX	214-630-2444
Southwestern Information Publishing	Wallace E. Downey	Irving, TX	214-929-0404
St. Bernard/Tri-Parish Telephone Directory	Pat Comiskey	Chalmette, LA	504-652-1800
Sturgis Journal	Richard Piatt	Sturgis, MI	616-651-5407
Suburban Telephone Directories dba Oak Cliff Telephone Directory	Danny Page	Dallas, TX	214-943-3444
Target Directories of Michigan, Inc.	Dale Engberson	Manitou Beach, MI	517-467-4811
Telbook LTD	Rodney B. Ryan	Southampton, NY	516-283-7075
Telecom*USA Publishing Co.	Arthur Christoffersen	Cedar Rapids, IA	319-366-1100
Telephone Directory of Texas, Inc.	James D. Vining	Jacksonville, TX	903-586-2987
Texas Directories Co., Inc.	Edward McNelis	Corpus Christi, TX	512-729-0042
TransWestern Publishing	Ricardo Puente	San Diego, CA	619-467-2800
United Directory Services, Inc.	Joel Ramsey	Bedford, TX	817-284-4499
United Publishers, Inc. dba CCC Directory Publishers	Len Townsend	El Segundo, CA	310-647-1510
Unity Service Co., Inc.	Mary J. Clifford	Unity, ME	207-948-2030
Universal Phonebooks, Inc.	A.P. Cook III	Jackson, MI	517-796-4105
University Directories	Kim Matheny	Chapel Hill, NC	800-743-5556
US South Directories	Pat O'Neil	Austin, TX	512-454-6464
USA Western Directories, Inc.	Burel Schaberg	Greenwood Village, CO	303-779-4511
Vega & Associates/ The Hispanic Yellow Pages	Juan Vega	Vienna, VA	703-903-9779
West Directories Inc.	Janet West Miller	Houston, TX	713-493-2965
White Directory Publishers, Inc.	Richard Lewis	Buffalo, NY	716-875-9100
Yellow Book Co., Inc.	Joe Walsh	Rockville Centre, NY	516-763-2106
Yellow Page One, Inc.	Harry Dubbs	Mt. Prospect, IL	847-439-8300